

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company, and AMAZON  
TECHNOLOGIES, INC., a Nevada corporation,

## Plaintiffs,

V.

Does 1-20, unknown parties doing business as "REKK," and the following individuals: Domantas Radeckas, Noah Page, Skylar Robinson, Luke Colvin, Alejandro Taveras, Andrew Ling, Brandon Sukhram, Cosmin Sopca, Jenny Tran, Olaf Booij, and Ryan Bates,

## Defendants.

No. 2:23-cv-01879-JLR

**STIPULATED PERMANENT  
INJUNCTION AS TO  
DEFENDANT CHARALAMPOS  
GKATZOULAS AND PROPOSED  
ORDER**

NOTED FOR CONSIDERATION:  
July 8, 2024  
*without oral argument*

## STIPULATION

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc. (together, “Amazon”), and Defendant Charalampos Gkatzoulas (“Gkatzoulas”) and (collectively “Settling Parties”), by and through Amazon’s and Gkatzoulas’s respective counsel of record, notify the Court that the Settling Parties have reached a settlement of all claims

1 between them in this matter. Pursuant to the terms of that settlement, the Settling Parties  
2 stipulate and agree to entry of the permanent injunction below.

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1 DATED this 8th day of July, 2024.

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3 Davis Wright Tremaine LLP  
4 Attorneys for Plaintiffs

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Charalampos Gkatzoulas  
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13 **PERMANENT INJUNCTION**

14 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that  
15 Defendant Charalampos Gkatzoulas, and his respective employees, agents, successors and  
16 assigns, and all others in active concert or participation with him, are permanently enjoined and  
17 restrained from:

18 1. Accessing and using, whether directly or indirectly via a third party, intermediary,  
19 or proxy, Amazon.com, or any other Amazon online store around the world;

20 2. Exploiting or abusing Amazon's ordering or return services;

21 3. Making false statements or misrepresentations to Amazon;

22 4. Engaging in any activity that defrauds Amazon into paying money or providing  
23 replacement products for illegitimate returns;

24 5. Engaging in any scheme or malicious activity that interacts with Amazon; and

25 6. Knowingly and materially assisting or engaging any other person or business  
26 entity in engaging in or performing any of the activities listed above.

The Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent Injunction.

IT IS SO ORDERED.

DATED: July 9, 2024.

Jimmie L. Blunt

The Honorable James L. Robart  
UNITED STATES SENIOR DISTRICT JUDGE